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October 21, 2005

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation
**   WC Docket No. 05-196**

Dear Ms. Dortch:

On October 21, 2005, Bryan Martin, Chairman and CEO of 8x8, Inc. and the undersigned counsel to 8x8, Inc. met with Michelle Carey, Legal Advisor to Chairman Kevin Martin. The purpose of the meeting was to present 8x8's perspective on the challenges of deploying an E-911 solution for nomadic VoIP subscribers within the timeframe established by the Commission. The attached presentation materials were used during the meeting.

Please refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,

DLA Piper Rudnick Gray Cary US LLP

/s/

Larry A. Blosser

larry.blosser@dlapiper.com

cc: Michelle Carey

Serving clients globally

1-866-TRY-VOIP

VoIP E9-1-1 Update
8x8, Inc. (Nasdaq:EGHT)

Bryan R. Martin
Chairman & CEO, 8x8, Inc.
October 21, 2005

hello
bonjour
Hei
aloha
boun giorno
hallo
moshimoshi
hola

8x8, Inc.

Who is 8x8?

- **Founded – 1987**
- **IPO – 1997 (Nasdaq:EGHT)**
- **Packet8 internet telephony service – history**

  – Launched service – www.packet8.net   November 2002

  – First $19.95/month unlimited plan   June 2003

  – First unlimited international plan   November 2003

  – First Virtual Office business plan   March 2004

  – First consumer VoIP E911 offering   June 2004

  – First consumer VoIP videophone service   June 2004

  – First $99 videophone / $19.95/month   April 2005
    service (with 2-year plan)

  – First integrated cordless phone offering   July 2005

  – First service outside US – freetalk in UK   September 2005

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Packet8 and 9-1-1

- **June 2004 - Packet8 was the first VoIP service provider to offer true E911 service to its customers**
- **911 calls are routed to a Public Safety Answering Point (PSAP) call taker**
  - Direct trunking to LEC's selective router with subscriber pop-up information (ALI); fully funded solution which paid PSAP via DID
  - Calls were <u>not</u> routed to 10-digit non-emergency administration lines
  - Caller & location information is delivered to the PSAP call taker
  - Currently available in ~2,200 rate centers (67% of the population)
- **May 2005 FCC ruling for <u>mandatory</u> & <u>nomadic</u> E911**
  - Now faced with customers who are initially provisioned (at time of purchase) with E911 who move to a new location
  - Suspending service while mobile is not reasonable nor "normal"
    - Subscribers are already accustomed to mobility via cellular phones
  - Nomadic requirements lead us to cellular call flows

Nomadic VoIP 9-1-1 Call Flow

- **Decouples the customer's number from location**
- **Allows near real-time updates to physical location**
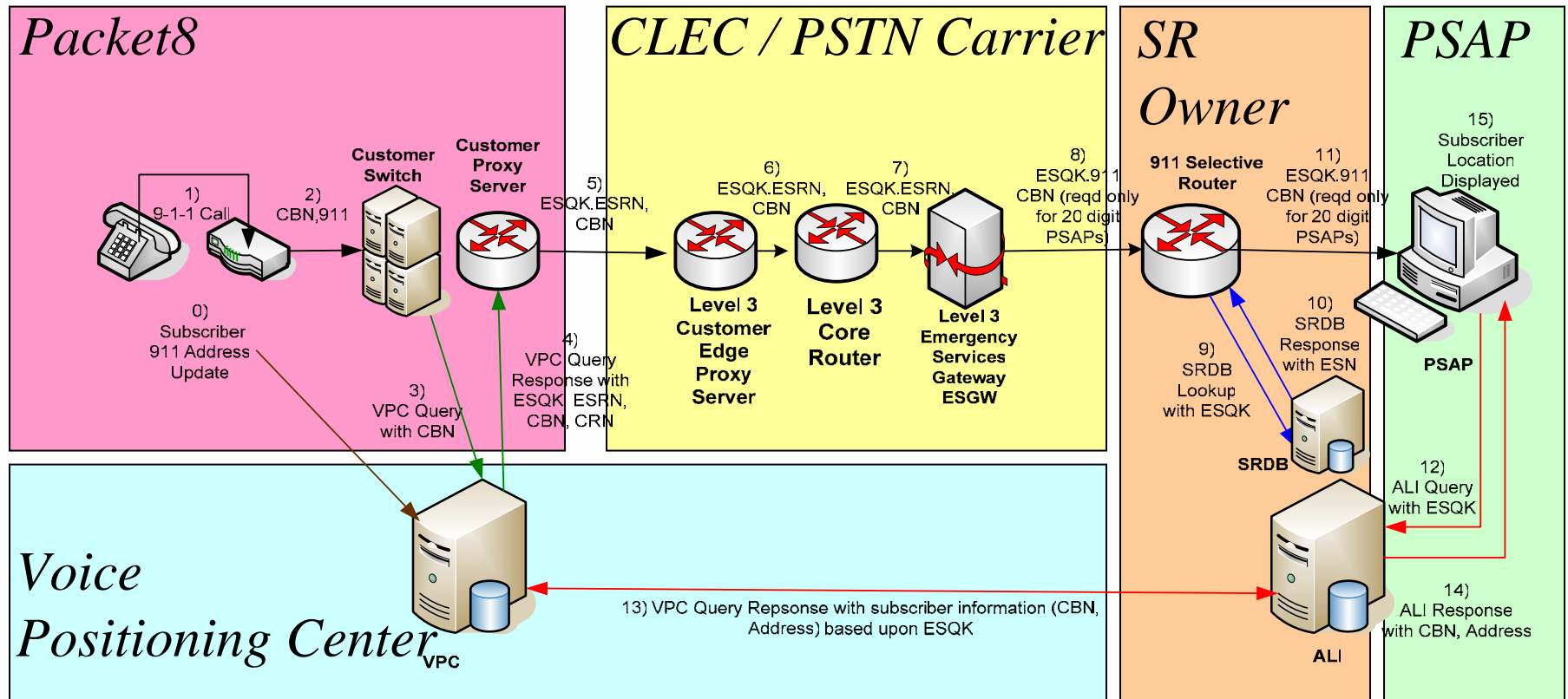
- **Transparent IP replacement for traditional E911 for most calls**

Operator Routing Support Service

- **Use of live Emergency Operator Routing Support Service for:**
  - Calls that involve subscriber location information that is or has become unprovisioned in the VPC database
  - Calls that cannot be routed through the appropriate selective router (either due to lack of connectivity or lack of ALI steering support)

- **Support service is 365x24x7 and employs APCO-certified operators**

- **Support service operator determines caller's location, looks up the number of the appropriate local emergency service, and participates in routing the call to the downstream agency**

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Benefits of 911 Support Service

- **The physical location of the caller is verified at the beginning of the call**
  - "911, do you need police, fire or ambulance"
  - "Are you located at *<address>?"*
  - "Stay on the line while I connect you to the local authorities"
- **Calls are routed to the correct PSAP/responder even if caller is not at the provisioned location**
- **Calls are announced to responders with phone number and address information**
  - Caller and support service operator are both on the line with the downstream agency
  - PSAPs that register a 10-digit contingency routing number with the VPC will receive location information via the support service operator

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Special Situations – Support Service

- **No voice contact with 9-1-1 caller**

- **Immediate disconnect, without speaking**

- **Emergency indicated, address and/or phone number are unknown**

- **The procedures to route these calls include VPC's simultaneous escalation to Packet8's Network Operations Center**

  – Any missing phone/address information can be augmented, determined and/or verified from the Packet8 customer record database and order history (including "ship-to" address data)

  – Information is communicated to the downstream agency indicating that the call originated from a Voice over IP phone and may not represent current address or physical location information

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Additional Benefits – Support Service

- **Operators are trained to ascertain if alternative 911 communication methods are available**
  - Continue to remain on line with the caller until resolution is achieved via any available alternatives
- **Information is available to 911 callers who are located outside of the United States and Canada**
- **Information is conveyed to callers who are testing/verifying the provisioning of their Packet8 nomadic E911 service**
- **Questions/inquiries from PSAPs are supported**
- **Paves the way for advancement/improvement of the nation's 911 system (NENA/I3)**
  - As opposed to disabling/disconnecting subscribers everytime they move their service

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Advantages over disconnection

- **FCC <u>mandatory</u> and <u>nomadic</u> order has created reverse incentives for customers to use VoIP mobility or to notify service provider of the new data**
- **Real world scenarios:**
  - Customer moves a provisioned device and does not update location
    - 8x8 Result   → Phone service works without interruption
            → E911 calls routed either to
              correct PSAP w/ good data via Operator, or
              incorrect PSAP w/ stale data
    - Disconnection   → Phone service is disconnected
            → E911 calls routed to incorrect PSAP w/ bad data
  - Customer moves a provisioned device and updates location to "off-grid" location
    - 8x8 Result   → Phone service works without interruption
            → E911 calls routed to correct PSAP w/ good data
    - Disconnection   → Phone service is disconnected
            → E911 calls not routable, 9-1-1 disconnected

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Open Issues

- **Funding the PSAPs / first responders**
  - In Packet8's previous E911 implementation, E911-enabled phone numbers were tied to the subscriber's physical location and funding was provided via the LEC providing the phone number
  - Phone numbers are no longer physically restricted to a known geography, how does the appropriate downstream agency get paid?
  - How do downstream agencies contacted through the Support Service get paid?

- **Timeline for PSAP outreach, subscriber outreach and education**

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